



U.S. Department of Justice

United States Attorney  
Southern District of New York

One St. Andrew's Plaza  
New York, New York 10007

September 30, 2020

**BY ECF**

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: *United States v. Todd Kozel*  
19 Cr. 460 (KMW)

Dear Judge Wood:

I write on behalf of the parties to suggest proposed sentencing deadlines.

On September 24, 2020, the defendant pled guilty to five counts of willful failure to file tax returns for the tax years 2011 through 2015, in violation of 26 U.S.C. § 7203. The Plea Agreement contemplates that before sentencing the Defendant will file accurate tax returns for the years 2011 through 2019. Consequently, the parties respectfully suggest that the following proposed deadlines would allow sufficient time for Mr. Kozel to complete that task:

Kozel Presentence Interview to be conducted by: **October 23, 2020**

First PSR disclosure due: **November 19, 2020**

Second PSR disclosure due: **January 17, 2021**

Sentencing Date: a date in **March 2021** that is acceptable to the Court.

Mr. Kozel further recognizes that his tax returns would need to be submitted to the IRS and an assessment completed before January 17, 2021, if that information is to be included in the final PSR report. Thank you for your consideration of these requests.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By: /s/

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